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January 27, 2025

VIA ECF

Hon. Alvin Hellerstein
United States District Court
Southern District of New York
500 Pearl Street, Room 1050
New York, NY 10007

Re: *Richardson v. Townsquare Media, Inc., Case No. 1:24-cv-04217*

Dear Judge Hellerstein:

We represent Defendant Townsquare Media, Inc. (“Defendant”) in the above-referenced action. We write to request a three-week extension of Defendant’s deadline to file a motion seeking an award of fees in this action.

On January 14, 2025, the Court issued its Opinion and Order dismissing the First Amended Complaint and finding the Defendant entitled to fees and costs pursuant to 17 U.S.C. § 505 (Dkt. 31). The Court held that Defendants’ “may prove” these fees. *Id.* The Clerk entered judgment on January 15, 2025 (Dkt. 32). Pursuant to Rule 54(d), Defendant’s motion in support of its fee award is due on **January 29, 2025**, 14 days after entry of judgment.

Defendant hereby requests a three-week extension of this deadline to **February 19, 2025**, to allow the parties adequate time to confer on whether the amount of Defendants’ fees may be resolved by settlement rather than through motion practice. This is Defendant’s first request to extend its fee motion deadline.

Plaintiff does not consent to this request, but consents only to a one-week extension of the deadline. Plaintiff’s position is as follows: “Plaintiff will only consent to a one-week extension to allow Defendant time to provide information on its settlement position and, to the extent necessary, Plaintiff’s request concerning a stay of the briefing of Defendant’s motion for fees pending appeal. The reason for one-week was to allow our office to present Plaintiff with his options prior to the expiration of Plaintiff’s time to file a notice of appeal. Defendant reiterated its position of three weeks but failed to explain why one-week would be insufficient for those purposes with the issue of a further extension being deferred pending Defendant’s responses.”

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We thank the Court for its attention to this matter.

Respectfully submitted,

Davis Wright Tremaine LLP

/s/ Abigail B. Everdell

Abigail B. Everdell

Attorney for Defendant Townsquare Media, Inc.

cc: Counsel of Record (via ECF)